

HEATHER E. WILLIAMS, #122664
Federal Defender
MEGAN T. HOPKINS, #294141
Assistant Federal Defender
Designated Counsel for Service
801 I Street, 3rd Floor
Sacramento, CA 95823
Telephone: 916-498-5700
Fax: 916-498-5710

Attorney for Defendant
JOSE CURIEL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
JOSE CURIEL, ET AL
Defendants.

) Case No. 2:22-cr-000151-WBS
)
) STIPULATION AND ORDER TO
) CONTINUE STATUS CONFERENCE AND
) EXCLUDE TIME
)
)
Date: December 12, 2022
Time: 9:00 a.m.
)
)

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel, Assistant United States Attorney Justin Lee, counsel for plaintiff, Assistant Federal Defender Megan T. Hopkins, counsel for defendant Jose Curiel, and Clemente M. Jimenez, counsel for defendant Roberto Tostado-Cadenas, that the status conference scheduled for October 3, 2022, be continued to **December 12, 2022, at 9:00 a.m.**

The government has provided defense counsel with more than 400 pages and several media files of initial discovery, which defense counsel is in the process of reviewing the initial discovery and conducting investigation. The parties believe a continuance to December 12, 2022, will permit defense counsel the additional time necessary to conduct pretrial investigation and engage in pre-plea negotiations.

1 The parties agree that the ends of justice served by resetting the status conference date
2 outweigh the best interest of the public and the defendant in a speedy trial. Therefore the parties
3 agree that time is excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

4

5 Dated: September 26, 2022

6 Respectfully submitted,

7 HEATHER E. WILLIAMS
8 Federal Public Defender

9 */s/ Megan T. Hopkins*
10 MEGAN T. HOPKINS
11 Assistant Federal Defender
12 Attorney for Defendant
13 JOSE CURIEL

14

15 Dated: September 26, 2022

16 */s/ Clemente M. Jimenez*
17 CLEMENTE M. JIMENEZ
18 Attorney for Defendant
19 ROBERTO TOSTADO-CADENAS

20

21 PHILLIP A. TALBERT
22 United States Attorney

23

24 Dated: September 26, 2022

25

26 */s/ Justin Lee*
27 JUSTIN LEE
28 Assistant United States Attorney
 Attorney for Plaintiff

19 **O R D E R**

20

21 **IT IS HEREBY ORDERED** that the preliminary hearing scheduled for October 3, 2022,
22 at 9:00 a.m. is continued to **December 12, 2022, at 9:00 a.m.** The time period between October
23 3, 2022 and December 12, 2022, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. §
24 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance
25 outweigh the best interest of the public and the defendant in a speedy trial.

26 Dated: September 30, 2022

27

28


 WILLIAM B. SHUBB
 UNITED STATES DISTRICT JUDGE